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*Pro Hac Vice, Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

INNOVATIV MEDIA GROUP, INC., a  
Wyoming corporation; TTP8, LLC, a Delaware  
limited liability company,

Plaintiffs,

vs.

MICHAEL BEYS; RICHARD DE SILVA;  
LATERAL U.S. OPPORTUNITIES FUND AI,  
L.P., a Delaware Limited Partnership;  
LATERAL U.S. CREDIT OPPORTUNITIES  
FUND QP, L.P., a Delaware Limited  
Partnership; LATERAL CREDIT  
OPPORTUNITIES, LLC, a Delaware limited  
liability company; LATERAL INVESTMENT  
MANAGEMENT, LLC, a Delaware limited  
liability company; LATERAL FTE FEEDER,  
LLC, a Delaware limited liability company;  
LATERAL JUSCOM FEEDER, LLC, a  
Delaware limited liability company; DOES I-X;  
ROE Entities, I-X,

Defendants.

– and –

FTE NETWORKS INC., nominal party.

CASE NO.: 2:22-cv-01184-JCM-EJY

**STIPULATION AND ~~PROPOSED~~  
ORDER SUBSTITUTING COUNSEL FOR  
PLAINTIFFS INNOVATIV MEDIA  
GROUP, INC. AND TTP8, LLC**

Please take notice that pursuant to Local Rule 11-6(c), Plaintiffs Innovativ Media Group, Inc. (“Innovativ”) and TTP8, LLC (“TTP8”) submit this Stipulation Substituting Counsel for Innovativ and TTP8 for this Court’s approval and state as follows:

1. The withdrawing attorneys are Catherine A. Reichenberg, Esq. and John R. Funk, Esq. of Gunderson Law Firm.

2. The substitute attorney is Therese Shanks, Esq. of Fennemore Craig, who has already appeared on behalf of Innovativ in *Innovativ Media Group, Inc. v. Beys, et al.*, Case No. 22-1362, which was recently consolidated into the above-captioned case and subsequently closed. *See* D.E. 79 in Case No. 22-1362.

3. Andrew K. Stutzman, Esq. of Stradley Ronon Stevens & Young, LLP, whose *pro hac vice* appearance has already been entered, remains counsel to both Innovativ and TTP8 in the instant action.

4. All withdrawing, substituting, and remaining counsel, as well as Innovativ and TTP8 have signed the instant Stipulation indicating their consent as required and seek the Court's approval to effectuate the withdraw and substitution.

/s/ Catherine A. Reichenberg

Catherine A. Reichenberg, Esq. (NSB No. 10362)

John R. Funk, Esq. (NSB No. 12372)

Gunderson Law Firm

3895 Warren Way

Reno, NV 89509

*Withdrawing Attorneys*

DATED: August 23, 2023

/s/ Therese Shanks

Therese Shanks, Esq. (NSB No. 12890)

Fennemore Craig, P.C.

7800 Rancharrah Parkway

Reno, NV 89511

*Substitute Attorney*

DATED: August 23, 2023

/s/ Andrew K. Stutzman

Andrew K. Stutzman, Esq., *admitted pro hac vice*

Stradley Ronon Stevens & Young, LLP

2005 Market Street, Suite 2600

Philadelphia, PA 19103

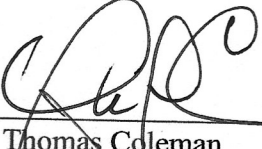
*Counsel for Innovativ Media Group, Inc. and TTP8, LLC*

DATED: August 23, 2023

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4 Innovativ Media Group, Inc., by and through its President, hereby consents to the  
5 substitution of Therese Shanks, Esq. and Andrew Stutzman, Esq. in the place and stead of  
6 Catherine A. Reichenberg, Esq. and John R. Funk, Esq., as its attorneys of record.  
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9 Dated: Aug. 23, 2023

10 INNOVATIV MEDIA GROUP, INC.

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13 BY: Thomas Coleman  
14 ITS: President  
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1 TTP8, LLC, by and through its Manager, hereby consents to the substitution of Therese  
2 Shanks, Esq. and Andrew Stutzman, Esq. in the place and stead of Catherine A. Reichenberg, Esq.  
3 and John R. Funk, Esq., as its attorneys of record.  
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5 **08/23/23**

6 Dated: \_\_\_\_\_

7 TTP8, LLC

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10 BY: Majique Ladnier  
11 ITS: Manager

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**ORDER**

FOR GOOD CAUSE SHOWN, it is hereby ORDERED that Therese Shanks, Esq. and Andrew K. Stutzman, Esq. are substituted as counsel for Innovativ Media Group, Inc. and TTP8, LLC in the place of Catherine A. Reichenberg, Esq. and John R. Funk, Esq.

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: August 28, 2023